



**SATIA**  
INDUSTRIES  
LIMITED

An ISO 9001, 14001 & 45001 company  
CIN : L21012PB1980PLC004329

Manufacturer of Quality  
Writing, Printing & Speciality  
Paper with ECO MARK  
GST IN : 03AACCS7233A1ZZ  
www.satiagroup.com

IS 1848



SIL/CS

Date: 16.04.2024

|  |   |
|--|---|
| The Manager<br>Listing Department<br>BSE Limited<br>Phiroze Jeejeebhoy Towers<br>Dalal Street<br>Mumbai-400001<br>Scrip Code: 539201 | The Manager,<br>Listing Department,<br>National Stock Exchange of India<br>Ltd, Exchange Plaza, Plot No. C/1, G-<br>Block, Bandra Kurla Complex,<br>Bandra (East), Mumbai-400051<br>Symbol: SATIA |
|--|---|

Sub: Annual Secretarial Compliance Report pursuant of Regulation 24A of SEBI  
(Listing Obligations and Disclosure Requirements) Regulations, 2015

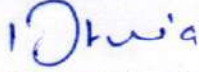
Dear Sir/ Madam,

In compliance to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD01/27/2019 dated February 8, 2019, we hereby submit Annual Secretarial Compliance Report dated April 15, 2024 issued by M/s S. PARNAMI & ASSOCIATES, Practising Company Secretaries for the Financial Year ended March 31, 2024.

This is for your reference and records please,

Thanking you  
Yours faithfully

For Satia Industries Ltd

  
(Rakesh Kumar Dhuria)  
Company Secretary

RAKESH  
KUMAR  
DHURIA  
Digitally signed  
by RAKESH  
KUMAR DHURIA  
Date: 2024.04.16  
15:39:41 +05'30'

SECRETARIAL COMPLIANCE REPORT OF SATIA INDUSTRIES LIMITED FOR THE  
FINANCIAL YEAR ENDED 31.03.2024

WE HAVE EXAMINED:

- (a) all the documents and records made available to us and explanation provided by Satia Industries Limited ("the listed entity"),
- (b) the filings/submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

FOR THE YEAR ENDED 31.03.2024

("REVIEW PERIOD") IN RESPECT OF COMPLIANCE WITH THE PROVISIONS OF:

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

THE SPECIFIC REGULATIONS, WHOSE PROVISIONS AND THE CIRCULARS/GUIDELINES ISSUED THEREUNDER, HAVE BEEN EXAMINED, INCLUDE: -

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (**Not applicable to the Company during the review period**)
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (**Not Applicable to the Company during the Review Period**);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (**Not Applicable to the Company during the Review Period**);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (**Not Applicable to the Company during the Review Period**);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-



Convertible Securities) Regulations, 2021; (Not Applicable to the Company during the Review Period):

- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;  
(i) (other regulations as applicable)

We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

| Sr. No | Particulars  | Compliance Status (Yes/No/NA) | Observations /Remarks by PCS* |
|--------|--|-------------------------------|-------------------------------|
| 1.     | <b>Secretarial Standards:</b><br>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.   | YES                           | NIL                           |
| 2.     | <b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li><li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li></ul> | YES                           | NIL                           |



|    |  |     |                           |
|----|--|-----|---------------------------|
| 3. | <p><b>MaintenanceanddisclosuresonWebsite:</b></p> <ul style="list-style-type: none"> <li>• TheListedentityismaintainingafunctional website</li> <li>• Timely dissemination of the documents/<br/>informationunderaseparatesection onthe website</li> <li>• Web-links provided in annual corporate governancereportsunderRegulation27(2) areaccurateandspecificwhichre-directstotherelevantdocument(s)/sectio nofthe website</li> </ul> | YES | NIL                       |
| 4. | <p><b>DisqualificationofDirector:</b></p> <p>NoneoftheDirector(s)oftheCompanyis/ aredisqualified under Section 164 of Companies Act, 2013asconfirmedby thelistedentity.</p>  | YES | NIL                       |
| 5. | <p><b>DetailsrelatedtoSubsidiariesoflistedentitie shavebeenexaminedw.r.t.:</b></p> <p>(a) Identificationofmaterialsubsidiarycom panies<br/>Disclosurerequirementofmaterialaswel lasothersubsidiaries</p>   | YES | No Material<br>Subsidiary |
| 6. | <p><b>PreservationofDocuments:</b></p> <p>The listed entity is preserving and maintaining recordsas prescribed under SEBI Regulations and disposal ofrecordsasperPolicyofPreservationofDocu mentsandArchivalpolicyprescribedunderS EBILODRRegulations,2015.</p>  | YES | NIL                       |
| 7. | <p><b>Performance Evaluation:</b></p> <p>The listed entity has conducted</p>   | YES | NIL                       |



|     |   |                          |   |
|-----|---|--------------------------|---|
|     | performance evaluationoftheBoard,IndependentDirector sandtheCommitteesat the start of every financial year/during the financial yearasprescribedinSEBI Regulations.   |                          |   |
| 8.  | <p><b>RelatedPartyTransactions:</b></p> <p>(a) ThelistedentityhasobtainedpriorapprovalofAuditCommitteeforallrelatedpartytransactions;or</p> <p>(b) The listed entity has provided detailed reasonsalong with confirmation whether the transactionswere subsequently approved/ratified/rejected bythe Audit Committee, in case no prior approvalhasbeenobtained.</p> | <p>YES</p><br><p>N.A</p> | <p>NIL</p><br><p>There is no such transaction</p> |
| 9.  | <p><b>Disclosureofeventsorinformation:</b></p> <p>Thelistedentityhasprovidedalltherequired disclosure(s) under Regulation 30 along with ScheduleIII of SEBI LODR Regulations, 2015 within the timelimitsprescribedthereunder.</p>   | YES                      | NIL   |
| 10. | <p><b>ProhibitionofInsiderTrading:</b></p> <p>The listed entity is in compliance with Regulation 3(5) &amp;3(6) SEBI (Prohibition of Insider Trading) Regulations,2015.</p>   | YES                      | NIL   |
| 11. | <p><b>ActionstakenbySEBIorStockExchange(s),if any:</b></p> <p>Noaction(s)hasbeentakenagainstthelisted entity/itspromoters/directors/subsidiaries eitherbySEBIor by Stock Exchanges</p>  | YES                      | NIL   |



|     |   |     |     |
|-----|---|-----|-----|
|     | (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/guidelines issued thereunder except as provided under separate paragraph herein (**). |     |     |
| 12. | <b>Additional non-compliances, if any:</b><br>No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.   | YES | NIL |

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019:

| Sr. No. | Particulars   | Compliance Status (Yes/No/NA) | Observations /Remarks by PCS* |
|---------|---|-------------------------------|-------------------------------|
| 1.      | <b>Compliances with the following conditions while appointing/re-appointing an auditor</b>  |                               |                               |
|         | i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/audit report for such quarter; or                             | N.A                           | NIL                           |
|         | ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/audit report for such quarter as well as the next quarter; or | N.A                           | NiL                           |



|           |  |     |      |
|-----------|--|-----|------|
|           | <p>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</p>   | Yes | Nil  |
| <b>2.</b> | <b>Other conditions relating to resignation of statutory auditor</b>   |     |      |
|           | <p>i. Reporting of concerns by Auditor with respect to the listed entity/ its material subsidiary to the Audit Committee :</p> <p>a. In case of any concern with the management of the listed entity/ material subsidiary such as non-availability of information/ non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without spe</p> | N.A | N.A, |



|  |   |                        |                                 |
|--|---|------------------------|---------------------------------|
|  | <p>cifically waiting for the quarterly Audit Committee meetings.</p>  |                        |                                 |
|  | <p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information/explanation from the company, the auditor has informed the Audit Committee the details of information/explanation sought and not provided by the management, as applicable.</p> <p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on</p> | <p>N.A</p> <p>N. A</p> | <p>N.A,</p> <p>do</p> <p>do</p> |





|    |   |     |     |
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|    | <p>thematter on receipt of such information fromtheauditorrelatingt otheproposaltoresignas mentioned above and communicate itsviewstothemagem entandtheauditor.</p> <p>ii. Disclaimerincaseofnon-receiptofinformation:</p> <p>Theauditorhasprovidedanap propriatedisclaimerinitsaudit report,whichisinaccordance with the Standards of Auditing asspecifiedbyICAI/NFRA,in casewherethelistidentity/ its material subsidiary has not providedinformationasrequir edbytheauditor.</p> | N.A |     |
| 3. | <p>The listed entity / its material subsidiary has obtainedinformation from the Auditor upon resignation, in theformatasspecifiedinAnnexure-AinSEBICircularCIR/CFD/CMD1 /114/2019dated18<sup>th</sup>October,2019.</p>  | N.A | N.A |

\*Observations/ RemarksbyPCSaremandatoryiftheCompliancestatusisprovidedas'No'or'NA'

(a) (\*\*) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelinesissuedthereunder, exceptin respectof matters specifiedbelow:



| Sr. No | Compliance Requirement (Regulations/circulars/guidelines including specific clause) | Regulation/Circular No | Deviations | Action Taken by | Type of Action | Details of Violation  | Fine Amount | Observations/Remarks of the Practicing Company Secretary | Management Response | Remarks |
|--------|---|------------------------|------------|-----------------|----------------|---|-------------|--|---------------------|---------|
|        |   |                        |            |                 |                | Advisory/Clarification/Fine/Show Cause Notice/Warning, etc. |             |  |                     |         |
|        |   |                        |            |                 |                | NIL   |             |  |                     |         |

(b) The listed entity has taken the following action to comply with the observations made in previous reports:

| Sr. No | Compliance Requirement (Regulations/circulars/guidelines including specific clause) | Regulation/Circular No | Deviations | Action Taken by | Type of Action | Details of Violation | Fine Amount | Observations/Remarks of the Practicing Company Secretary | Management Response | Remarks |
|--------|---|------------------------|------------|-----------------|----------------|----------------------|-------------|--|---------------------|---------|
|        |   |                        |            |                 |                | Advisory             |             |  |                     |         |

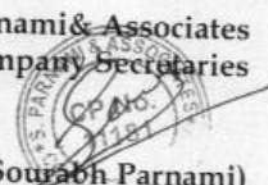


**S. PARNAMI & ASSOCIATES**  
Company Secretaries

H. No. 396, Ganpati Enclave,  
Dabwali Road, Bathinda-151001 PB.  
Mobile: 098886-90900, 9815630484  
Email:sourabhparnami@yahoo.com

|  |  |  |  |  |   |  |  |  |  |  |
|--|--|--|--|--|---|--|--|--|--|--|
|  |  |  |  |  | y/Clarification/<br>Fine/Show<br>Cause<br>Notice/<br>Warning<br>,etc. |  |  |  |  |  |
|  |  |  |  |  | N.A   |  |  |  |  |  |

For S. Parnami & Associates  
Company Secretaries



(Sourabh Parnami)  
Membership No. F9396  
(COP No. 11181)  
UDIN: F009396F000127217

Dated: 15/04/2024  
Place: Bathinda